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800 DC, LLC D/B/A BIZZIE and 1-800-DRY CLEAN

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

11           LAWRENCE SHIFMAN, an individual, ) Case No. 3:13-cv-05934-EMC  
12           GORETTI SHIFMAN, an individual, DRY )  
13           CLEANING DELIVERY SERVICES, INC., a )  
14           California corporation, )  
15                 Plaintiff, )  
16                 vs. )  
17                 800 DC, LLC D/B/A BIZZIE and 1-800-DRY )  
18                 CLEAN, a Michigan corporation, ) Current Date of Hearing: March 13, 2014  
19                 KOSTOPOULOS RODRIGUEZ, PLLC, a )  
20                 Michigan Professional limited liability )  
                    company, K. DINO KOSTOPOULOS, an )  
                    individual, DOE ONE through DOE TWENTY, )  
                    inclusive, )  
                    Defendants. )  
                    ) Stipulated Date of  
                    Continued Hearing: May 22, 2014  
                    Time:                           1:30 p.m.  
                    Courtroom:                   5

Plaintiffs Lawrence Shifman, individually; Goretti Shifman, individually; and, Dry Cleaning Delivery Services, Inc. ("DCDS") (collectively "Plaintiffs") and Defendants 800 DC, LLC d/b/a BIZZIE and 1-800-DRY CLEAN ("800 DC"); Kostopoulos Rodriguez, PLLC; and, K. Dino Kostopoulos, individually, (collectively "Defendants"), have reached a settlement of this action in principal. Pursuant to the United States District Court for the Northern District of California Local Rules ("Civil L.R."), Rule 7-7, the Parties respectfully request, by and through their respective counsel, that the Court continue until May 22, 2014,

1 at 1:30 p.m. in Courtroom 5, the hearing on Defendants' Motion to Dismiss and Special  
2 Motion to Strike filed pursuant to Civil L.R. 7, which are presently scheduled to be heard by  
3 the Honorable Edward M. Chen on Thursday, March 13, 2014 at 1:30 p.m. in Courtroom 5,  
4 so that the Parties can finalize and execute all necessary paperwork to effectuate the  
5 settlement of this action. The Parties have not previously stipulated to continue the hearing  
6 date on these dispositive motions. Civil L.R. 7-7(b)(1). In the interest of judicial economy  
7 and to avoid any unnecessary time and expense, Plaintiffs intend to file a dismissal of this  
8 entire action against all Defendants, with prejudice, as soon as the settlement agreement is  
9 fully-executed.

**IT IS HEREBY STIPULATED**

Dated: March 12, 2014

HINSHAW & CULBERTSON LLP

By: *D. Basner*  
RONALD E. MALLEN  
KENDRA L. BASNER  
Attorneys for Defendants  
KOSTOPOULOS RODRIGUEZ, PLLC,  
K. DINO KOSTOPOULOS  
800 DC, LLC D/B/A BIZZIE and 1-800-DRY  
CLEAN

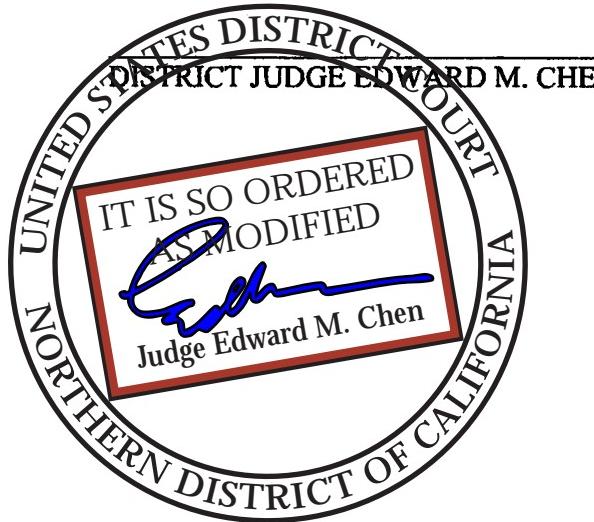
Dated: March 12, 2014

LAW OFFICES OF RANDALL M. WIDMANN

By: RANDALL M. WIDMANN  
Attorney for Plaintiffs

1 PURSUANT TO STIPULATION, IT IS SO ORDERED. The CMC is also reset from 5/29/14  
2 to 6/12/14 at 9:00 a.m. A joint CMC statement shall be filed by 6/5/14.

3 DATED: 3/12/14



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**CERTIFICATE OF SERVICE**

*Shifman v. 800 DC, LLC, Kostopoulos*

**United States District Court, Northern District of California**

Case No. 5:13-cv-05934-EMC

I am a citizen of the United States and employed in San Francisco, California, at the office of a member of the bar of this Court at whose direction this service was made. I am over the age of 18 and not a party to the within actions; my business address is One California Street, 18th Floor, San Francisco, California 94111.

On March 12, 2014, I served the document(s) entitled,

**STIPULATION AND ORDER TO CONTINUE HEARING ON DEFENDANTS' SPECIAL MOTION TO STRIKE AND MOTION TO DISMISS PLAINTIFFS' COMPLAINT**

on the interested parties in this action by placing trust copies thereof enclosed in a sealed envelope(s) addressed as stated below:

**SEE ATTACHED SERVICE LIST**

14  (BY MAIL): I deposited such envelope in the mail at San Francisco, California with  
15 postage fully prepaid. I am readily familiar with this firm's practice of collection and processing  
16 correspondence for mailing. Under that practice it would be placed for collection and mailing,  
17 and deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid  
at San Francisco, California, in the ordinary course of business. I am aware that on motion of  
party served, service is presumed invalid if postal cancellation date or postage meter date is  
more than 1 day after date of deposit for mailing in affidavit.

18  **(VIA OVERNIGHT MAIL):** I deposit such envelope to be placed for collection and  
19 handling via UPS following our ordinary business practices. I am readily familiar with this  
business' practice for collecting and processing correspondence for UPS. On the same day that  
material is placed for collection, it is picked by UPS at San Francisco, California.

(BY ELECTRONIC MAIL): By transmitting a true copy thereof to the electronic mail addresses as indicated below.

22  (BY CM/ECF SERVICE): I caused such document(s) to be delivered electronically via CM/ECF as noted herein.

I declare under penalty of perjury under the laws of the United States that the above true  
and correct and was executed on March 12, 2014, at San Francisco, California.

Bonnie Horne

## **SERVICE LIST**

***Shifman v. 800 DC, LLC, Kostopoulos***

Case No. 5:13-cv-05934-EMC

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